

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYAH REED

6801 McCormick Drive
Upper Marlboro, Maryland 20772

Plaintiff

v.

EQUIFAX INFO. SVCS. LLC,

c/o CSC-Lawyers Incorporating Service Company
7 Saint Paul Street, Suite 820
Baltimore, Maryland 21202

EXPERIAN INFORMATION SOLUTIONS, INC.,

c/o Joy C. Einstein, Esq.
Shulman Rogers, P.A.
12505 Park Potomac Avenue, 6th Floor
Potomac, Maryland 20854-6803

Trans Union, LLC,

c/o CSC-Lawyers Incorporating Service Company
7 Saint Paul Street, Suite 820
Baltimore, MD 21202

Verizon Communications, Inc.,

c/o Corporation Trust Incorporated
2405 York Rd #201
Lutherville Timonium, MD 21093

and

Southwest Credit Systems, L.P.

c/o Corporation Trust Incorporated
2405 York Rd #201
Lutherville Timonium, MD 21093

Defendants.

Case No.

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S
NOTICE OF REMOVAL
(Federal Question Jurisdiction)**

Defendant Experian Information Solutions, Inc. (“Experian”), by and through its undersigned counsel, hereby provides Notice pursuant to 28 U.S.C. §§ 1441 and 1446 of its removal of the above-captioned case from the Civil Division of the Circuit Court of Maryland for Prince George’s County. Removal is based on 28 U.S.C. § 1331 (federal question jurisdiction). As grounds for removal, Experian states the following:

1. On February 6, 2024, Plaintiff Maryah Reed commenced this action against Experian and others by filing a Complaint in the Circuit Court of Maryland for Prince George’s County (the “State Court Action”). The State Court Action was assigned Case No. C-16-CV-24-000645. Relevant to this notice, Plaintiff alleges that Defendants violated the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681 *et seq.*
2. Removal to this Court is proper pursuant to 28 U.S.C. § 1446(a) and 1441(a), this Notice of Removal is being filed in the United States District Court for the District of Maryland, which is the federal court embracing the state court where the State Court Action was filed.
3. Defendant Experian was served on March 8, 2024.
4. Upon information and belief, Experian is the only defendant that has been served in this case, and therefore, no other party to this action needs to consent to this Notice of Removal.
5. Removal is timely pursuant to 28 U.S.C. § 1446(b), as the thirty day deadline was Sunday, April 7, 2024 and this removal is being made on the next business day.
6. This Notice of Removal is signed pursuant to Federal Rule of Civil Procedure 11. *See* 28 U.S.C. § 1446(a).

7. Contemporaneously filed herewith are copies of all “process, pleadings, and orders” received by Defendant Experian in the State Court Action, and which are attached hereto as set forth below.

- a. Plaintiff’s Complaint is attached hereto as ***Exhibit A***.
- b. Summons to Experian is attached hereto as ***Exhibit B***.
- c. A copy of the Notice of Filing of Removal that Experian will file in the Circuit Court of Maryland for Prince George’s County, and will promptly serve upon Plaintiff is attached hereto as ***Exhibit C***.

8. This Court has “original jurisdiction of all civil action arising under the Constitution, law, or treaties of the United State.” 28 U.S.C. § 1331. Pursuant to 28 U.S.C. § 1441 (a), “[e]xcept as otherwise expressly provided by Act of Congress, any civil action brought in a State court of which the district courts of the United State have original jurisdiction, may be removed by the defendant, to the district court of the United States for the district and division embracing the place where such removal is pending.” 28 U.S.C. § 1441(a). Additionally, pursuant to 28 U.S.C. § 1441(b), “[a]ny civil action of which the district courts have original jurisdiction founded on a claim or right arising under the Constitutions, treaties, or laws of the United States shall be removed without regard to the citizenship of the parties.” 28 U.S.C. § 1441(b).

9. Defendant Experian is entitled to remove this action to this Court pursuant to 28 U.S.C. § 1441. Plaintiff’s assertion of claims arising under the FCRA renders this suit one over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1331.

Wherefore, having satisfied all the requirements for removal under 28 U.S.C. §§ 1441 and 1446, including the presence of all jurisdiction requirements established by 28 U.S.C. §

1331, Defendant Experian respectfully jointly serve notice that the above-referenced State Court Action, now pending in the Circuit Court of Maryland for Prince George's County.

Dated: April 8, 2024

Respectfully Submitted,

SHULMAN ROGERS, P.A.

/s/ Joy C. Einstein

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*Counsel for Defendant Experian Information
Solutions, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2024, I served a copy of the foregoing on all parties of record via U.S. Mail postage prepaid on the following:

Maryah Reed
6801 McCormick Drive
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Pro Se Plaintiff

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